

**Confidentiality policy on the OK social network (www.ok.ru)**

1.1. This Policy is an official document of VK Limited Liability Company (official state registration number 1027739850962, Russia, 125167, Moscow, Leningradskiy prospekt 39, building 79) (hereinafter, the "Administration of the Social Network" or "Company"), and outlines the procedure for the processing and protection of information (hereinafter, "Information") about individuals (hereinafter, "Users") using the OK social network, including the website, mobile version of the website and application, and OK Live application (hereinafter, "Social Network").

1.2. The purpose of this Policy is to ensure the sufficient protection of information about Users, including their personal data, against unauthorized access and disclosure.

1.3. Matters pertaining to the collection, storage, dissemination and protection of information about Users of the Social Network are regulated by this Policy and the License Agreement (jointly referred to hereinafter as the "Rules"), in addition to the current legislation of the Russian Federation.

1.4. The use of the Social Network is subject to the User's agreement to the Rules. Each instance of accessing and/or actual use of the Social Network constitutes the User's agreement to the terms of this Policy and the terms of the License Agreement available at <https://ok.ru/regulations> (hereinafter, the "Agreement") as of their version current at the moment of actual use of the Social Network. Some terms used in this Policy have the meaning set forth in the License Agreement.

1.5. The current version of the Policy is available to any Internet user via the <https://ok.ru/privacy> link. This Policy may be amended by the Administration of the Social Network. Any amendments to this Policy are made by the Administration of the Social Network at its own discretion, and come into effect on the day following the day of publication of such amendments. The Administration of the Social Network notifies Users on the amendments made to this Policy, including publishing the new version of this Policy. The User is obliged to independently familiarize themselves with any amendments made to this Policy. Actual use of the Social Network by the User after the amendment of the terms of this Policy constitute the User's agreement to the new terms.

1.6. Should the User not agree to the terms of this Policy, they must cease their use of the Social Network immediately.

1.7. If the law requires separate consent of the User to process personal data in connection with the use of the Social Network, such consent shall be requested from the User only in relation to the use of the Social Network. It is not permitted to request a single consent for all social networks and social interaction platforms.

## 2. Terms of use of the Social Network

2.1. The Administration of the Social Network, which provides Users with a license to use the Social Network to the extent described in the Agreement, acting in a reasonable manner and good faith, considers that the User:

- shall possess all necessary rights authorizing them to register for and use the Social Network;
- shall provide reliable information about themselves in the amount necessary for obtaining a license and using the Social Network;
- shall be aware of and agree to the fact that the information published by the User about themselves on the Social Network shall be displayed on their Personal Page, and also that such information may be available to other Users of the Social Network and/or may be indexed by search engines based on the Internet users' requests, if no other setting has been chosen by the User within the functionality of the Social Network.

2.2. The Administration of the Social Network does not check the reliability of received (collected) information about Users, with the exception of those cases where such a check is required to fulfill the obligations of the Administration of the Social Network to the User.

## 3. Purposes of information processing

The Administration processes information about Users for the purposes of fulfilling the agreement concluded with the User (the License Agreement available at <https://ok.ru/regulations>).

## 4. Content of information about Users

4.1. Information processed by the Administration of the Social Network includes:

4.1.1. Account Data to be understood as:

- (a) the User's data provided by the User for the purpose of creating an account at the time of registration with the Social Network;
- (b) additional information entered by the User for the purpose of editing their account in the course of using the Social Network;
- (c) data additionally provided by the User at the request of the Administration of the Social Network for the purposes of fulfilling the Company's obligations to the User arising out of the agreement on the provision of the Social Network functionality.

4.1.2. Other data required for the Social Network to function, i.e.:

- (a) data regarding technical equipment (devices), technological interaction with the Social Network (including host IP address, the User's operating system, browser, geographical location, Internet Service Provider);
- (b) information obtained automatically by accessing the Social Network using bookmarks (cookies);
- (c) information obtained as a result of the User's actions on the Social network, in particular, information about adding any content;
- (d) information obtained as a result of the actions of other Users on the Social Network;
- (e) summarized analytical information on the use of Internet-based services.

The Account Data and other data received by the Administration of the Social Network in the amount as necessary and sufficient for such data to be considered personal data in accordance with the current legislation of the Russian Federation shall be processed by the Administration of the Social Network as personal data pursuant to this Policy.

4.1.3. By registering and/or authorizing in the Social Network via the VK ID tool, the User accepts the Privacy Policy of the VK Ecosystem available at <https://id.vk.com/privacy>.

4.2. The table below contains a list of Account Data and Other Data processed by the Administration of the Social Network for the purposes of fulfilling the agreement concluded with the Users:

Information collected	Purpose of processing
Applicable to all platforms (web version, Android and iOS applications) when using the Social Network	
<b>Account Data</b> , i.e.:  1) The User's data provided by the User for the purpose of creating an account at the time of registration with the Social Network, including first name, last name, date of birth, gender, mobile phone number, and other information required to fulfill the agreement with the User. During registration, the User is assigned an internal ID	To fulfill the agreement concluded with the User, in particular, for the provision of access to, management of the Social Network, verification of the Social Network account belonging to the applicant who requested to restore access to the account to make recommendations about the User to other Users who have their phone number in their contacts.

birth, current city of residence, education and career information, location of military service, images, and other information required to fulfill the agreement with the User. 3) Data additionally provided by the User at the request of the Administration of the Social Network (information specified by the User in the account, such as first name, last name, email, phone number, images; information on the statutory representative of the applicant (last name, first name, patronymic, grounds for statutory representation)).	
<b>Other Data, i.e.:</b>  4) Information about the User's activities when using the Social Network, including, but not limited to, clicks and transitions within the Social Network interface, information about joining/leaving groups, adding other Users to friends list, participation or refusal to participate in meetings, making/receiving donations, and other information required to fulfill the agreement with the User. 5) Information obtained as a result of the actions of other Users on the Social Network (in particular, tags made on videos and photos by other Users, and other information required to fulfill the agreement with the User). 6) Summarized analytical information on the use of Internet-based services.	To fulfill the agreement concluded with the User, in particular, management, improvement and personalization of the Social Network.
7) Information obtained as a result of your use of payment functions on the Site (for example, the first six and last four digits of your card number).	We use this information to administer the Site, including to provide the Site Services to you. We may also use it to address complaints on your behalf and to provide you with better services.
8) Information you create on your page and on the Site outside of the page editing section (including statuses, microblog entries, images, audio recordings, video recordings, comments, and group discussion entries).	We use this information to operate the Site, including to provide services to you. We may also use this data to customize and improve the advertisements and recommendations presented on the Site and to measure the effectiveness of those advertisements.
<b>Web version of the Social Network</b> ( <a href="https://ok.ru/">https://ok.ru/</a> )	
<b>Other Data, i.e.:</b>  9) Technical data obtained by accessing the Social Network, including data regarding technical equipment (devices), technological interaction with the Social Network (including host IP address, user's operating system, browser, geographical location, Internet Service Provider, data obtained from accessing the camera, microphone, and other information required to fulfill the agreement with the User). 10) Information obtained automatically by accessing the Social Network using bookmarks (cookies).	To fulfill the agreement concluded with the User, in particular, management, improvement and personalization of the Social Network.
<b>OK Android application</b>	
<b>Other Data, i.e.:</b>  11) Data accessible by the Administration of the Social Network in the course of using the application by the User, including but not limited to the device type (Smartphone/Tablet/Wear), device name, GAID, OpenUDID, OS version, device model, contacts from contact lists of the User (on a mobile device and in applications), time zone, preferred language, list of the User's accounts, phone numbers linked to the accounts, Device ID For Vendor, Wi-Fi name, MAC of Wi-Fi access point, mobile operator name, mobile network code (MNC), User ID, OS name, application version, year of manufacture of the User's mobile device, type of Internet connection, Apps Flyer UID, and other information required to fulfill the agreement with the User.	To fulfill the agreement concluded with the User, in particular, management, improvement and personalization of the Social Network, including to recommend to the User other Users whose contact information is contained in their phone book, as well as to provide the possibility to maintain the phone book in the Social Network for personal purposes.
<b>OK iOS application</b>	
<b>Other Data, i.e.:</b>  12) Data accessible by the Administration of the Social Network in the course of using the application by the User, including but not limited to the device type (Smartphone/Tablet/iPod), device name, IDFA, OpenUDID, Apps Flyer UID, OS version, device model, contacts from contact lists of the User (on a mobile device and in applications), time zone, preferred language, list of the User's accounts, phone numbers linked to the accounts, Device ID For Vendor, geographical values, Wi-Fi name, MAC of Wi-Fi access point, mobile operator name, mobile network code (MNC), applications installed on the User's device, and other information required to fulfill the agreement with the User.	To fulfill the agreement concluded with the User, in particular, management, improvement and personalization of the Social Network, including to recommend to the User other Users whose contact information is contained in their phone book, as well as to provide the possibility to maintain the phone book in the Social Network for personal purposes.
<b>Applicable to all platforms (Android and iOS applications) when using the OK Live application</b>	
<b>Account Data, i.e.:</b>  13) The User's data provided by the User for the purpose of creating an account at the time of registration with OK Live: mobile phone number. 14) Data additionally provided by the User at the request of the Administration of the Social Network (information specified by the User in the account, such as first name, last name, email, phone number, images; information on the statutory representative of the applicant (last name, first name, patronymic, grounds for statutory representation), and other information required to fulfill the agreement with the User).	To fulfill the agreement concluded with the User, including but not limited to the provision of access to, management of the application, verification of the Social Network account belonging to the applicant who requested to restore access to the account.
<b>OK Live Android application</b>	
<b>Other Data, i.e.:</b>  15) Data accessible by the Administration of the Social Network in the course of using the application by the User, including but not limited to the device type (Smartphone/Tablet/Wear), device name, GAID, OpenUDID, OS version, device model, time zone, preferred language, list of the User's accounts, phone numbers linked to the accounts, Device ID For Vendor, Wi-Fi name, MAC of Wi-Fi access	To fulfill the agreement concluded with the User, in particular for management, improvement and personalization of the application.

connection, Apps Flyer (UID), and other information required to fulfill the agreement with the User.	
<b>OK Live iOS application</b>	
<b>Other Data, i.e.:</b>  16) Data accessible by the Administration of the Social Network in the course of using the application by the User, including but not limited to the device type (Smartphone/Tablet/iPod), device name, IDFA, OpenUDID, Apps Flyer UID, OS version, device model, time zone, preferred language, list of the User's accounts, phone numbers linked to the accounts, Device ID For Vendor, geographical values, Wi-Fi name, MAC of Wi-Fi access point, mobile operator name, mobile network code (MNC), applications installed on the User's device, and other information required to fulfill the agreement with the User.	To fulfill the agreement concluded with the User, in particular for management, improvement and personalization of the application.
<b>OK Video Android application</b>	
<b>Other Data, i.e.:</b>  17) Data accessible by the Administration of the Social Network in the course of using the application by the User, including country (code)/region (code), language (code), name of the device manufacturer, type of the device product, name of the device model, time stamp of the discovered error, equipment version/OS version/application version, and other information required to fulfill the agreement with the User.	To fulfill the agreement concluded with the User, in particular for management and improvement of the application.

**4.3.** The functionality and rules of use of the Social Network may permit the User to post any information on the Social Network (if applicable) other than that specified in clauses 4.1. and 4.2. of this Policy, if not contrary to current legislation requirements. The Company does not intend to process such information, as well as biometric and special personal data categories. By posting information about themselves, the User understands that such information may be accessible by an unspecified amount of the Internet users according to the User's preferred level of confidentiality.

**4.4.** The Administration of the Social Network does not intend to process and does not process biometric data (in particular, it does not use images to identify users) and sensitive data.

**4.5.** In order to fulfill obligations in provision of functional possibilities of the Social Network, the User gives to the Administration of the Social Network their consent to use the phone number or other identifier of the User for the purposes of sending messages from the Social Network to the User with the use of the notification means of the Administration of the Social Network (push notifications), including utilizing services and applications from partners of the Administration of the Social Network or utilizing other services and applications belonging to the Administration of the Social Network. The proprietary SDK of the Administration of the Social Network is used, and the User's data are not passed to the partners of the Administration of the Social Network.

#### **4.6. Processing of cookies**

Cookies are small fragments of data which are requested by websites from the browser used on the User's computer or mobile device. Cookies are stored locally on computers or mobile devices of the Internet users.

The Administration of the Social Network collects and processes cookies regarding Users that visit the site of the Social Network.

The following types of cookies are used on the Social Network:

- strictly necessary cookies/technical cookies: these cookies are required for the functioning of the site and provision of the User with services of the Social Network; in addition to other functions, they let the Company identify the User's hardware and software, including the browser type;
- statistics/analytics cookies: these files allow for user recognition, counting their numbers and gathering data, such as operations executed on the site of the Social Network, including the information on visited web pages and the content received by the User;
- technical cookies: these files gather data on how users interact with the site of the Social Network, which allows to determine errors and test new functions in order to increase the performance of the services of the Social Network;
- functional cookies: these cookies allow for availability of certain functions that make the use of the site of the Social Network simpler, e.g. saving preferences (such as language and location);
- (third party) tracking files/advertising cookies: these cookies gather data on traffic sources, visited pages and advertisements displayed for the User. They allow to display advertisements that may interest the User based on the analysis of information about the User that has been collected. They are also used for statistics and research purposes.

Cookies are processed by the Administration of the Social Network exclusively for the purpose listed in section 3 of this Policy, on conditions and in a manner determined in this Policy, in particular, with the basis on data obtained with help of cookies. The Company develops most useful functions available for the User for the Social Network, executes research of the statistics, fixes errors in the Social Network and tests new functions in order to increase the performance of the Social Network, personalized them and displays information that is most relevant to the User.

Information gathered with the help of cookies on the User's device may be sent and accessible to the Company and/or third parties listed in section 5 of this Policy, as well as companies that own such web analytics services as Rating Mail.ru, Yandex.Metrika and Google Analytics. Use of information gathered with help of cookies outside of the site of the Social Network for advertising purposes, if there are any, can be subject to separate license agreements available on sites of the Company or third parties. The Company and/or third parties also can give the User an opportunity to opt out of the advertisement personalization, which can also be subject to legislation and rules applicable to such products and offers.

The User can opt out of cookies processing in the settings of their browser. In the listed case, only cookies that are strictly necessary for the functioning of the site and provision of its functional capabilities are going to be used on the site of the Social Network.

#### **4.7. Processing of Other Data in the use of the OK and OK Live mobile applications**

Other Data on the operation of the OK application may be sent to myTarget (VK LLC), VK Ads (VK LLC) or Yandex Ad (Yandex), for the personalization of advertisements displayed to the User on the Social Network and also to Google CrashLytics (Google) for the analysis of errors in the operation of the application, to myTracker (VK LLC), Google Analytics (Google), or Google Firebase Analytics (Google) for the receipt of aggregated analytical information on the operation of the application.

Other Data necessary to support the operation of several functional capabilities of the Social Network are sent to Google Tag Manager (Google) and VKontakte SDK (VKontakte).

Other Data on the operation of the OK Live application are sent to myTarget (VK LLC) for the personalization of advertisements displayed to the User in the application, and also to Google CrashLytics (Google) for the analysis of errors in the operation of the application and to myTracker (VK LLC), Google Analytics (Google) and Google Firebase

4.8. The Social Network uses the YouTube API as provided in clause 8.27. of the Agreement. Google's Privacy Policy is available at <https://www.google.com/policies/privacy>.

## 5. Processing of information about Users

5.1. Information about Users is processed in accordance with the following principles:

- a) legality of the purposes and methods of processing Account and Other Data;
- b) good faith;
- c) correspondence of the purpose of such data processing to the purposes defined and stated before its collection, and to the authority of the Administration of the Social Network;
- d) correspondence of the amount and nature of Account Data and Other Data processed, and the methods of their processing to the purposes of processing Account Data and Other Data;
- e) the unacceptability of unifying databases created for incompatible purposes and which contain Account Data and Other Data.

### 5.1.1. Terms and purposes of Account Data and Other Data processing

The Administration of the Social network processes Account Data and Other Data of the User for the purposes of fulfilling the Agreement between the Administration of the Social Network and the User on issuing a license for the right to use the Social Network (section 3 of the License Agreement, <https://ok.ru/regulations>).

### 5.1.2. Collection of Account Data and Other Data

The collection of Account and Other information of the User is performed during registration and/or authorization on the Social Network via completion of the registration form by the User or by other available means, including the VK ID tool or other third party service, as well as afterwards when the User chooses to add additional information about themselves using the tools provided by the Social network. The collection of Other Data of the User is performed in the course of using the Social Network by the User.

### 5.1.3. Storage and use of Account Data and Other Data

Account Data and Other Data of Users are processed and stored within the Russian Federation; they are stored exclusively on electronic media and processed using automated systems, with the exception of such cases where non-automated processing of Account Data and Other Data is necessary to comply with legislation requirements.

Account Data and Other Data are stored by the Administration of the Social Network until the processing purposes have been achieved, i.e. within the effective term of the Agreement concluded with the User, and within the term stipulated by the current legislation of the Russian Federation after the Agreement has been terminated.

In the case of deletion of a Personal Page, the Administration of the Social Network stores the necessary Account Data and Other Data of the User on its electronic media for the period required and established by the current legislation of the Russian Federation. In the event of the User themselves deleting their Personal Page, the User has the right to restore their Personal Page within 183 days of the moment of its deletion.

### 5.1.4. Transfer of Account Data and Other Data

Account Data and Other Data of Users is not transferred to any third parties, with the exception of the cases directly specified by these Rules.

The Company can transfer Account Data and Other Data of the Users to third parties on the condition of compliance with the purpose, and if there are legal grounds, listed in this Policy. These third parties may include:

- parties involved in the provision of services connected with the placement and display of information to users (including offers relevant to users' interests) in programs, products, or services which belong to those parties or are controlled by them (such as the owners of sites, applications, advertising networks, other parties, etc.);
- parties which have the legal right to process Account or Other Data, for example, if the transmission of Account and Other Data to these parties takes place with the agreement of the User, including if the Account or Other Data are necessary for the provision of the User with a corresponding service or for the fulfilment of a particular agreement or contract concluded with the User, in particular, operators of cellular networks and/or technological partners operating between the Company and operators of cellular networks in the execution of clauses 6.4.7. and 6.4.10. of the License Agreement or clause 7.3. of this Policy. These entities also include [partners and affiliates of the Company](#) who may process data in accordance with conditions of this Policy;
- third parties for which an assignment of rights or obligations or a novation by a corresponding agreement was made;
- any state or local executive agencies which the Company is obliged to provide with information in accordance with applicable legislation upon a corresponding request.

Applications made available and supported on the Social Network by third parties (developers) that operate independently from the Administration of the Social Network and do not represent or act on behalf of the Administration of the Social Network. Users are obligated to independently familiarize themselves with the terms of service and personal data protection policies of such third parties (developers) before using the corresponding applications, including social network applications on the Platform. In the event of use of Applications in the Application Platform of the Social Network, your phone number and/or e-mail and/or name (depending on what minimum data is required for authorization/registration to the Application) will be transferred to the owner (developer) of the corresponding Application in order to enable you to use the Application in the Application Platform. In addition, with your consent, expressed when downloading the application, the Administration of the Social Network also has the right to additionally transfer your name, last name and image to the owners (developers) of the application.

For the purposes of provision of quality, multifunctional, easy-to-use Services oriented to personal needs and interests of the Users, the Administration of the Social Network shall develop, improve, optimize current and introduce new functionality to the Social Network (of an informative, communicative, advertising, educational, entertaining or other nature), including with the involvement of partners and/or affiliates.

Taking the aforementioned into account, and also taking the purposes of processing executed by Administration of the Social Network and listed in section 3 of this Policy into account, the User agrees and instructs the Administration of the Social Network to execute following actions:

- processing, including collection, recording, systematization, accumulation, storage, clarification (updating, amending), comparison, extraction, use, blocking, deletion/destruction of Account Data and Other Data of the User;
- transfer of Account Data and Other Data to partners and affiliates, and their processing by partners and affiliates based on the instruction from the Administration of the Social Network (in ways listed in this clause), as well as co-processing Account Data and Other Data by partners and affiliates and data that are already at the disposal of partners and affiliates;
- collection (receipt) from partners and/or affiliated parties of the results of the processing of Account or Other Data together with data at the disposal of the partners or affiliated parties, including in the form of integer and/or textual values or identifiers.

Taking into account the nature and functional particularities of the Social Network, the operation of the information resource may enable the study of the market for goods and services, including the evaluation of supply and demand, turnover of goods, analysis of the effectiveness of informational, advertising, and marketing campaigns conducted

about them received from the Company's partners, and provided by the Company's partners with legal grounds for such processing, to the extent specified in the Privacy Policy of the Company's partner, which you use, in order to improve the quality of the services provided by the Site, namely: to satisfy the your interests by showing information relevant to your interests, targeting of accurate advertising (showing information relevant to your interests), the formation of generalized statistical/analytical information based on the use of the Site and Partner service(s).

The Administration of the Social Network may perform transborder transfer of Information in the minimum amount necessary for the purposes specified in this Policy to the third parties specified in clauses 4.7. and 5.1.4. of this Policy.

Some web resources and applications of the third parties may present an opportunity to use their functions via authorization with the use of data from the User's profile on the Social Network. During such authorization, the web resource or application of the third party requests consent or permission from the User to use data from the User's profile on the Social Network. Said consent must indicate the volume of data used upon authorization and the procedure for their processing. In agreeing with the authorization to use data from the profile on the Social Network, the User gives consent to the transmission of data from his or her profile on the Social Network to the third party which owns the web resource or application within which said authorization takes place in the amount specified in the consent/permission and requested by said web resource or application.

When the User uses the VK ID tool, their personal data, as well as other information that does not count as personal data, may be transferred to third parties (Services of the VK Ecosystem and other services that utilize the VK ID tool when the User uses such services and/or tools). The Administration of the Social Network may also receive personal data, as well as other information that does not count as personal data, from listed third parties, in the volumes listed in the personal account of the User of the VK Ecosystem, for the purposes of the fulfillment of agreements with the User of the VK Ecosystem.

The Administration of the Social Network may share User's data with Services of the VK Ecosystem, as well as external Services that utilize tools of the VK Ecosystem, in order to give the User access, opportunities and benefits of the VK Ecosystem, e.g. in case if the User decides to authorize in the Service with help of the VK ID tool. By starting to use such Service/tool/their separate functions, the User agrees with such data transfer in volumes required for the Service/tool to function. Thus, the User agrees with and accepts the User documentation of such Service of the VK Ecosystem and/or its tool in full, without any reservations and exceptions. In case the User does not agree with any provisions of the User documentation of the Service/tool, the User does not have the right to use such Service/tool. The list of Services of the VK Ecosystem is available at: [https://vk.com/vk\\_ecosystem\\_services](https://vk.com/vk_ecosystem_services). The list of Tools of the VK Ecosystem is available at: [https://vk.com/vk\\_ecosystem\\_tools](https://vk.com/vk_ecosystem_tools).

#### 5.1.5. Cessation of Account Data and Other Data processing

Upon achievement of the purposes of processing Account Data and Other Data, the Administration of the Social Network stops processing such Account Data and Other Data using one of the methods stipulated by the Federal Law "On Personal Data".

## 6. Rights and responsibilities of Users

### 6.1. Users have the right to:

- 6.1.1. obtain open and free access to information about themselves by means of loading their Personal Page on the Social Network via their username and password;
  - 6.1.2. set their desired level of confidentiality (terms of access to information) using the tools of the Social Network subject to the tools of the Social Network in accordance with Clause 6.3. of this Policy;
  - 6.1.3. individually make amendments and corrections to information about themselves on their User Personal Page on the Social Network on the condition that such amendments and corrections contain current and reliable information;
  - 6.1.4. delete information about themselves from their Personal Page on the Social Network;
  - 6.1.5. request from the Administration of the Social Network: correction, blocking or destruction of their Account Data in the event of such data being incomplete, outdated, unreliable, illegally obtained or being unnecessary to the stated purpose of processing, or if the User cannot individually take the measures specified in Clauses 6.1.3. and 6.1.4. of this Policy;
  - 6.1.6. request and receive information from the Administration of the Social Network regarding their Account Data processing.
  - 6.1.7. change the privacy settings on the Site or in the Application of the Social Network/in the settings of the User's mobile device by disabling the option of data processing related to the User's location and/or information about the application of the Social Network listed in clauses 12–13 of the Table above;
  - 6.1.8. change the settings of the User's mobile device by disabling the option of data processing related to the User's contacts from the phone contacts on the mobile device;
  - 6.1.9. opt out from the mailout of messages of advertising/information as nature or containing news executed via e-mail in accordance with clause 6.4.7. of the Agreement by transition via corresponding link in the message body sent via e-mail.
- In case if the User changes the settings in accordance with clauses 6.1.7.–6.1.8. of the Rules, the Social Network shall cease processing of corresponding data.

6.2. As the Social Network is a universal means of communication and finding people, and the main function of the Social Network is the restoration and support of communication between old and new acquaintances, the following information about a registered User is available to the Internet users:

- 6.2.1. the User's first and last names, date of birth (without year), place of birth and current city of residence;
- 6.2.2. profile picture;
- 6.2.3. the User's number of friends, photos, groups, games, videos and gifts.

6.3. The User, acting on their own, determines the conditions and grants access to their personal data to an unrestricted number of people, which includes registration and use of standard functions of the Social Network, as well as selection of privacy settings and visibility of their Personal Page as part of access to the functionality of the Social Network given to the User. The Administration of the Social Network does not initiate and does not influence such selection made by the User, and does not have a goal to get the User's consent needed to disseminate their personal data. Processing of personal data made available to an unrestricted number of people by the User is executed by the Administration of the Social network on the basis of the Agreement and in accordance with its conditions.

### 6.4. User settings for the level of confidentiality of information about themselves:

- 6.4.1. The User has the right, subject to the restrictions stated in clause 6.2. of these Rules, to set one of the following levels of confidentiality for their Account Data available in settings at the address <https://ok.ru/settings/privacy>.
- 6.4.2. In regard to the information recognized in Clause 6.2. of these Rules, the User has the right to set one of the following levels of confidentiality:
  - a) information is available to all Internet users and is indexed by search engines;
  - b) information is not available to Internet users and is not indexed by search engines;
- 6.4.3. The Administration of the Social Network does not assume responsibility for the disclosure of Users' Account Data by other Users of the Social Network that obtained access to such data in accordance with the User's selected level of confidentiality.
- 6.4.4. Upon deletion of Account Data (other user information) from the Personal Page of the User, or the deletion of a Personal Page from the Social Network by the User, information about the User copied by other Users or stored on the pages of other Users is saved

**7.1.** The Administration of the Social Network adopts technical, organizational and legal measures to facilitate the protection of Account Data and Other Data of Users from illegal or accidental access, destruction, alteration, blocking, copying, dissemination and other illegal actions.

**7.2.** Authorized access to the Social Network requires the username (email or mobile phone number) and password of the User. The User assumes responsibility for the security of this information. The User does not have the right to share their username or password with third parties, and is obliged to take measures to ensure their confidentiality.

**7.3.** For the purposes of ensuring more reliable protection of information about Users, the Administration of the Social Network uses a system linking Personal Pages to mobile phones. To enable the operation of this system, the User must provide the Administration of the Social Network with their mobile phone number. As part of this system linking Personal Pages to mobile phones, the User may restore access to their Personal Page in the event of the loss of their username or password using a recovery code (in a text message) sent to their mobile phone.

For the purposes of registration of the User on the Social Network, their authorization, verification of the current phone number linked to the Personal Page, and restoration of access to the Personal Page, the Administration of the Social Network may also make a call to the User's phone number and hang up. Upon receipt of such a hung-up call, the User is required to enter the code in the corresponding field, i.e. several last digits of the phone number from which such hung-up call was received. Depending on the operating system of the User's mobile device, the code may be imported to the corresponding field automatically. Hung-up calls are subject to the User's preliminary consent obtained at the time of registration and use of the Social Network to the provision of access to the call history on the User's mobile device to the Administration of the Social Network. Such access to the call history on the User's mobile device is only used for the purpose of the code importing when using the hung-up call function and protection from spam and mass registrations.

## **8. Limitations of liability of the Administration of the Social Network**

**8.1.** The Administration of the Social Network does not assume responsibility for any actions of third parties accessing information about the User as a result of using the Internet or the Social Network in accordance with the User's selected level of confidentiality, or for the consequences of using information which, as part of the Social Network, is available to any Internet user. The Administration of the Social Network advises Users to take a responsible approach to the amount of information they share about themselves on the Social Network.

## **9. User communication**

**9.1.** The Administration of the Social Network provides the User or their representative with information on Account Data and Other Data processed by the Administration of the Social Network, included but not limited to the User's personal data, upon request.

**9.2.** Such requests shall be sent in writing to the location address of the Administration of the Social Network or in any other form stipulated by the current legislation of the Russian Federation.

**9.3.** The User may revoke their consent to the processing of their personal data by sending an application in writing to the location address of the Administration of the Social Network in accordance with current legislation requirements.

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